

Remarks

Claims 2, 4, 7, 8, 12, 15-26 are now pending in this application. Applicant has amended claim 23 and presented new claim 26 to clarify the present invention. Applicant respectfully requests favorable reconsideration of this application.

The Examiner rejected claims 2, 7, 8, 15-17, 20, and 23-25 under 35 U.S.C. § 102(b) as being anticipated by French patent 2,473,673. The Examiner rejected claims 4, 21, and 22 under 35 U.S.C. § 103(a) as being unpatentable over French patent 2,473,673. The Examiner rejected claim 20 under 35 U.S.C. § 103(a) as being unpatentable over French patent 2,473,673.

French patent 2,473,673 does not disclose the present invention as recited in claim 23 or claim 26 since, among other things, French patent 2,473,673 does not disclose a structure that includes at least one projecting guide member including a plurality of generally vertically extending projections arranged about a central axis and at least one receiving guide member including a receiving structure, each receiving structure having an inner surface defining a truncated cone, where the truncated cone at a wider end extending further from the central axis than the projections. Rather, Fig. 4 clearly illustrates that the projections 18 identified by the Examiner extend beyond the truncated cone identified by the Examiner. Such a truncated cone as recited in claims 23 and 26 guides the projections into the recesses. On the other hand, French patent 2,473,673 discloses that manipulating arms 3a guide the mating structures.

Rather, French patent 2,473,673 discloses a repair unit including a multi-coupler 8 fitted

to a pipeline and onto which a manned submarine attaches a mating connector 9 to enable remote control from the submarine. Utilizing a hydraulic pump unit 10 and flexible hydraulic connections 11/manipulating arms 3a acting as “guidelines”, a submariner is able to perform repair operations of the pipeline. On the other hand, the device of the present invention with receiving structure that includes a truncated cone inner surface to guide projecting members into recesses in the receiving member has nothing to do with and does not at all require any connections 11. In fact, the present invention is aimed to operate without use of guidelines.

French patent 2,473,673 also does not disclose projections that extend vertically above or below recesses as recited in claims 23 and 26. Rather, projections 18 extend laterally away from cut out portions 20 of the structure that is placed over the projections. The projections 18 do not extend throughout cut out portions of the structure that is placed over the projections.

Additionally, the structure 9 rests on the top surface of projections 18 in French patent 2,473,673. On the other hand, the receiving guide member of the present invention as recited in claims 23 and 26 does not rest on the top of the projections. This cannot be since the projections extend throughout the recesses in the truncated cone and extend vertically above or below the recesses.

Furthermore, the feature of that the truncated cone at a wider end extending further from the central axis than the projections, as now recited in claims 23 and 26, implies a quite different coupling principle as compared to the French patent 2,473,673. The receiving guide member/truncated cone itself may act as a guide for guiding the projections into engagement

with the recesses, or guiding the recesses into engagement with the projections, depending on which part is the moving one. This guiding with the receiving guide member/truncated cone itself can permit the the present invention to work as a guidelineless solution. In contrast, French patent 2,473,673 does not disclose a guidelineless solution.

In addition, the hydraulic coupler as described in the French patent 2,473,673 further requires locking means. This is described, for example, at page 6, lines 4-5, which states, "Les fenêtres 22 servent au passage des doigts de verrouillage comme on l'explique ci-apres.", i.e. "The windows 22 serve for passage of locking fingers as will be explained hereafter." Also, French patent 2,473,673 describes sealing means. For example, at page 6, line 9, French patent 2,473,673 states, "du corps 23 est obturée par un couvercle 24...", i.e. "the body 23 is sealed by a lid 24". Clearly, such locking means and sealing means are not required by the present invention and disclose a quite different coupling principle.

In view of the above, French patent 2,473,673 does not disclose all elements of the present invention as recited in newly amended claim 23, claims 2, 7, 8, 12, 15-20, 24 and 25, which depend from claim 23, or newly presented claim 26. Since French patent 2,473,673 does not disclose all elements of the present invention as recited in newly amended claim 23, claims 2, 7, 8, 12, 15-20, 24 and 25, which depend from claim 23, or newly presented claim 26, the present invention, as recited in claims 2, 4, 7, 8, 12, 15-18 and 19-26, is not properly rejected under 35 U.S.C. § 102(b). For an anticipation rejection under 35 U.S.C. § 102(b) no difference may exist between the claimed invention and the reference disclosure. *See Scripps Clinic and Research Foundation v. Genentech, Inc.*, 18 U.S.P.Q. 841 (C.A.F.C. 1984).

Along these lines, anticipation requires the disclosure, in a cited reference, of each and every recitation, as set forth in the claims. *See Hodosh v. Block Drug Co.*, 229 U.S.P.Q. 182 (Fed. Cir. 1986); *Titanium Metals Corp. v. Banner*, 227 U.S.P.Q. 773 (Fed. Cir. 1985); *Orthokinetics, Inc. v. Safety Travel Chairs, Inc.*, 1 U.S.P.Q.2d 1081 (Fed. Cir. 1986); and *Akzo N.V. v. U.S. International Trade Commissioner*, 1 U.S.P.Q.2d 1081 (Fed. Cir. 1986).

French patent 2,473,673 does not suggest the present invention as recited in claims 4, 21, and 22 since, among other things, French patent 2,473,673 does not suggest a structure that includes at least one projecting guide member including a plurality of generally vertically extending projections arranged about a central axis and at least one receiving guide member including a receiving structure, each receiving structure having an inner surface defining a truncated cone, where the truncated cone at a wider end extending further from the central axis than the projections. French patent 2,473,673 also does not suggest projections that extend vertically above or below recesses. Adding low friction material in general or the specific materials recited in claims 21 and 22 to the structure suggested by French patent 2,473,673 would not overcome these deficiencies. Therefore, French patent 2,473,673 does not suggest the present invention as recited in claims 4, 21, and 22.

French patent 2,473,673 does not suggest the present invention as recited in claim 20 since, among other things, French patent 2,473,673 does not suggest the structure of the present invention as recited in claim 23, from which claim 20 depends. Additionally, French patent 2,473,673 does not suggest an oil and/or gas exploitation device, that is, a hydrocarbon

production device. Therefore, one of ordinary skill in the art would not look to French patent 2,473,673, which relates to a multi-coupler device to solve unrelated problems with an oil and/or gas exploitation device. Thus, the technical field of French patent 2,473,673 is quite different from the present invention as recited in claim 23, from which claim 20 depends, or claim 26.

In view of the above, the reference relied upon in the office action does not disclose or suggest patentable features of the present invention. Therefore, the reference relied upon in the office action does not anticipate the present invention or make the present invention obvious. Accordingly, Applicant submits that the present invention is patentable over the cited reference and Applicant respectfully requests withdrawal of the rejections based on the cited reference.

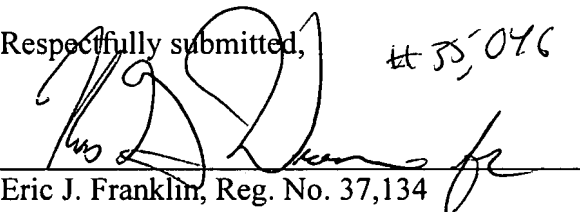
If an interview would advance the prosecution of this application, Applicant respectfully urges the Examiner to contact the undersigned at the telephone number listed below.

The undersigned authorizes the Commissioner to charge insufficient fees and credit overpayment associated with this communication to Deposit Account No. 22-0261.

Date:

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Respectfully submitted,


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